

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

TAMMIE FRALEY, et al.,

Plaintiffs,

v.

MERITUS MEDICAL CENTER, INC., et
al.,

Defendants.

Case No. 1:20-cv-01023-DLB

PRAECIPE

COME NOW the Parties, jointly by and through their undersigned counsel, and respectfully submit this Praecipe in accordance with the Court's ruling and instructions during the January 3, 2022 telephonic status hearing pertaining to the Parties' pending Joint Motion to Modify the Scheduling Order, stating the following:

1. The parties had previously submitted a proposed Amended Scheduling Order; however, the Court informed parties that the proposed deadlines were extended too far into the future and asked the parties to modify the previously proposed dates. In response, Counsel conferred and submitted an amended motion with new deadlines within a shorter time period as previously requested.

2. A telephonic status hearing was then set by the Court and held on January 3, 2022. During that hearing, a new trial date of April 17-May 5, 2023 was agreed upon by the parties, and the parties were directed to produce a new scheduling order. The parties have conferred and reached an agreement as to the following deadlines:

Deadline	Current Date	Proposed Date
Rule 26(e)(2) Supplementation of Disclosures and Responses	12/30/2021	Waived
Discovery Deadline, Submission of Status Report	1/6/2021	10/7/2022
Requests for Admissions	1/6/2021	10/7/2022
Dispositive Motions/Daubert Motions	2/1/2021	11/18/2022
Oppositions to Dispositive Motions & Daubert Motions	N/A	12/16/2022
Motions in Limine	N/A	1/25/2023
Oppositions to Motions in Limine	N/A	2/15/2023
Jury Trial	October	

3. The parties believe that the Court's docket and schedule should dictate an available date for a hearing on any Dispositive Motions or Daubert Motions.

4. Additionally, the parties are all currently available to appear for a hearing on Motions in Limine/Pretrial Conference on the following dates: March 1, 2023; March 2, 2023; and March 10, 2023.

5. A Proposed Order has been submitted with this Praecipe.

WHEREFORE, the Parties respectfully request that this Honorable Court amend the current Scheduling Order as indicated above.

Respectfully submitted,

PAULSON & NACE, PLLC

/s/ Matthew A. Nace, Esquire
Matthew A. Nace, Esquire #29684
man@paulsonandnace.com
1025 Thomas Jefferson St., NW, Suite 810
Washington, DC 20007
202-463-1999 – Telephone
202-223-6824 – Facsimile
Counsel for Plaintiffs

ARMSTRONG, DONOHUE, CEPPUS
VAUGHAN & RHOADES, CHTD.

/s/ Eric Rhoades, Esquire
Jon Eric Rhoades, Esquire #12605
jrhoades@adclawfirm.com
German A. Rodriguez, Esquire #19006
grodriguez@adclawfirm.com
204 Monroe Street, Suite 101
Rockville, MD 20850
Counsel for Defendant Meritus Medical Center, Inc.

PESSIN KATZ LAW, P.A.

/s/ Natalie C. Magdeburger, Esquire
Natalie C. Magdeburger, Esquire #04647
nmagdeburger@pklaw.com
Gregory Kirby, Esquire #28196
gkirby@pklaw.com
901 Dulaney Valley Road, Suite 500
Towson, MD 21204
*Attorneys for Defendants Chintu Sharma, M.D.,
MDICS at Meritus Medical Center, LLC d/b/a Adfinitas
Health at Meritus Medical Center LLC, and Adfinitas
Health at Meritus Medical Center, LLC*

VARNER & GOUNDRY, P.C.

/s/ Frederick W. Goundry, III, Esquire
Frederick W. Goundry, III, Esquire #09440
fgoundry@vglaw.org
121 East Patrick Street
Frederick, MD 21701
Attorneys for Defendants, Associated Radiologists, P.A.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of January, 2022, I caused a true and exact copy of the foregoing to be served via CM/ECF upon:

Matthew A. Nace, Esquire
Paulson & Nace
1025 Thomas Jefferson St., NW
Suite 810
Washington, DC 20007

Natalie C. Magdeburger, Esquire
Gregory Kirby, Esquire
Pessin Katz Law, P.A.
901 Dulany Valley Road
Suite 500
Towson, MD 21204

Frederick W. Goundry, III, Esquire
Varner & Goundry
121 East Patrick Street
Frederick, MD 21701

/s/ German A. Rodriguez
German A. Rodriguez, Esquire #19006